

## **REMARKS**

The Office Action dated May 8, 2009 has been fully considered by the Applicant.

Claims 1-3, 12 and 16 have been canceled. Claims 4-11 and 13-15 have been previously presented. Claims 17 and 18 have been currently amended. Claim 17 has been amended to include the limitations of claims 2 and 3. Further support for currently amended claim 17 can be found in Figures 1 and 2. Claim 18 has been amended to merely correct claim dependency. No new matter has been included in either Claim 17 or 18.

Claims 4- 11, 13-16 and 18 have been rejected under 35 USC §103(a) as being unpatentable over United States Patent No. 5,995,155 to Schindler et al in view of United States Publication No. 2006/029229 to Brightman et al. Reconsideration of the rejection is respectfully requested.

Claim 18 has been amended to clarify that the data to be stored includes instruction data and block data and that the paths for the data are decoupled.

In addition, claim 18 has been amended to further clarify that the control system utilizes a single storage-instruction first-in-first-out buffer that is capable of receiving instructions in generic form. Because Applicant's single storage-instruction first-in-first-out buffer is capable of receiving instructions in a generic form, the control commands for automating the bulk transfer of the digital data are compatible with and can therefore intermix with the register read and write commands being in generic form.

Therefore, in Applicant's invention, the presentation of instructions from the single storage-instruction FIFO buffer to the storage means can be sent at a maximum possible rate of transmission and such rate will be limited only by the operation of the storage means.

It is easy to see that Applicant's invention provides a flexible, scalable receiver that allows efficient data transfer using current international standards as well as further international standards.

Therefore, Applicant sincerely believes that currently amended independent claim 18 is not taught or suggested in the cited references.

The Schindler et al patent does not teach or suggest a system wherein the data to be stored includes instruction data and block data, and that paths for the data are decoupled, as is taught in Applicant's invention.

In addition, the Schindler et al patent does not teach or suggest a single storage-instruction FIFO buffer capable of receiving instructions for (1) register read and write commands in generic form for the control of storage of the digital data and (2) control commands for automating the bulk transfer of digital data from the control system.

Further, the Schindler et al patent does not teach or suggest a single FIFO buffer capable of receiving and intermixing register read and write commands the control of storage of data with the control commands for automating the bulk transfer of digital data from the control system.

The Schindler et al patent teaches only toward use of a typical FIFO buffer that merely overwrites old information with new when the buffer is full.

Further, there is no teachings in the Schindler et al patent of receiving generic instructions on user and system functions in the portion of text cited by the Examiner. Indeed there only appears to be disclosure of buffering MPEG data with a FIFO buffer according to column 11, lines 9-11, rather than differing command types being intermixed within the buffer as in Applicant's invention.

The Brightman et al publication does not teach or suggest the use of a single, storage-information FIFO buffer into which control commands for the control system are inserted together

with register read and write commands with which they are compatible and intermixable, as in Applicant's invention.

To the contrary, in the Brightman et al publication, different commands go to different FIFO buffers as is clearly set forth below at Paragraph 0485:

How other commands are handled depend on whether they are read or write commands or other commands. The other commands go to command FIFO; the addresses for read command go to read address FIFO 4013; the addresses for write commands to write address FIFO 4021 and the data goes to write data FIFO 4017; data being read in response to a command is output to READ DATA FIFO 4043; these FIFOs serve to provide the elasticity needed in the interface between DCP 293 and SDRAM 227.

The Brightman publication does not teach or disclose the use of a single storage-instruction FIFO buffer, as disclosed in Applicant's invention.

In contrast, the Brightman et al publication discloses the need for multiple FIFO buffers and the need for multiple type of FIFO buffers. For example, the following FIFOs buffers are required in the Brightman et al publication: a DRAM CONFIG. FIFO 4032 and 4005; READ ADDR. FIFO 4013; WRITE ADDR. FIFO 4021, WRITE DATA FIFO 4027; and READ DATA FIFO 4043.

It is difficult to understand how a person skilled in the art would consider combining the teachings of the use of a standard FIFO buffer, as taught in the Schindler patent, with the teaching for the need of multiple FIFO buffers and multiple type of FIFO buffers as taught in the Brightman et al publication to arrive at Applicant's single storage-information FIFO buffer which has the capabilities of receiving instructions in a generic form and which can receive instructions for both (1) read/write commands for control of storage of data and (2) control system commands for automating the bulk transfer of digital data to and from a storage means and therefore allow the two command to intermix.

Applicants sincerely believe that the currently amended claim 18 is not taught or suggested in the cited references, taken alone or in combination, and therefore respectfully request reconsideration of the rejection.

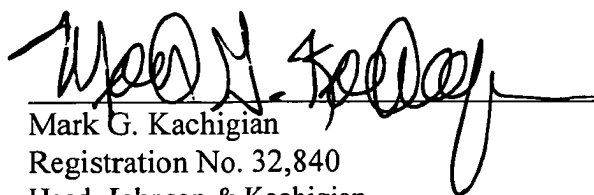
Claims 2 and 3 have been rejected under 35 USC 103(a) as being unpatentable over United States Patent No. 5,995,155 to Schlinder et al in view of United States Patent No. 5,740,466 to Geldman et al in further view of United States Patent No. 4,166,289 to Murtha et al.

Claims 2 and 3 have been canceled.

The remaining claims are dependent on independent Claim 18 and are believed allowable for the same reasons.

It is believed that the foregoing is fully responsive to the Office Action. If any issues remain, a telephone conference with the Examiner is requested. If any fees are associated with this action, please charge Account No. 08-1500.

Respectfully submitted,



Mark G. Kachigian  
Registration No. 32,840  
Head, Johnson & Kachigian  
228 West 17<sup>th</sup> Place  
Tulsa, Oklahoma 74119  
(918) 587-2000  
Attorneys for Applicant

Date: 6 August 2009